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August 2, 2024

Via: ECF

Magistrate Judge Miroslav Lovric
Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: Shara v. Binghamton Precast & Supply Corp. et al., 3:23-cv-135

Dear Judge Lovric:

The deadline for discovery to be complete in this matter was August 1, 2024. I submit this letter as a joint request, with both parties consenting, to an extension of the discovery deadline, until November 1, 2024.

This extension is necessary for Defendants to continue to search for and produce all documents responsive to Plaintiff's discovery requests.

The parties apologize to the Court for the untimeliness of this request and recognize that this request should have been made prior to the expiration of the current deadline.

We thank the Court for its attention to this matter.

Very truly yours,
COUGHLIN & GERHART, LLP

By Angelo D. Catalano
Partner

cc: Adam Sackowitz, Esq.